

Zemel Law

Consumer Protection

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October 14, 2022

Via ECF:

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

**RE: Brian Watson *et al.* v. Lexus of Manhattan
1:20-cv-04572-LGS
Letter Motion Requesting Extension of Time
To Submit Class Notification**

Honorable Court,

This office represents the Plaintiffs in this matter. Plaintiffs submit this letter-motion pursuant to Rule III(B) of Your Honor's Individual Rules and Practices in Civil Cases, requesting an extension of time to provide the proposed Class Notification.

Pursuant to the Court's Opinion and Order on September 29, 2022 [ECF190], Plaintiffs were ordered to confer with Defendant as to the Notice and any proposed Class Action Notice Administration form, as well as "submit a proposed form of Class Notification to the Court for review and approval within twenty-one days of this Order." As the Order was issued on September 29, this would make the deadline to submit the proposed Class Notification due on October 20.

Since the Court's Order was entered, Plaintiff's counsel has been on vacation abroad for the Jewish holidays which run through October 18. As such, he has been unable to confer with counsel for Defendant and finalize an agreed upon Class Notification. Plaintiff's counsel will be returning to the U.S. next week and respectfully requests an extension of three weeks, until November 10, 2022, to confer with Defendant and submit the proposed Class Notification to the Court.

Counsel for Defendant has confirmed that he does not object to this extension of time.

Application GRANTED. The parties shall file a proposed form of Class Notification to the court for review and approval by **November 10, 2022**.

Dated: October 14, 2022
New York, New York



**LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE**

Respectfully submitted,

/s/ Daniel Zemel
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